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Proposed Counsel for the Debtor in Possession

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF UTAH
CENTRAL DIVISION

In re:

THE FALLS EVENT CENTER LLC, a
Utah limited liability company,

Address: 9067 S 1300 W, #301
West Jordan, UT 84088,

Tax I.D. No. 90-1023989,

Debtor in Possession.

Bankruptcy Case No. 18-25116

Chapter 11

Honorable Kimball Mosier

[Filed Electronically]

**NOTICE OF DEBTOR'S EMERGENCY MOTION FOR ORDER AUTHORIZING USE
OF CASH COLLATERAL AND PROVISION OF ADEQUATE PROTECTION**

AND

NOTICE OF PRELIMINARY HEARING ON MOTION

Objection Deadline: Monday, July 30, 2018

Preliminary Hearing Date and Time: Monday, July 16, 2018, at 10:00 a.m.

PLEASE TAKE NOTICE THAT, on July 13, 2018, The Falls Event Center LLC, a
Utah limited liability company (the “**Debtor**”), the debtor in possession, filed its *Debtor's*

Emergency Motion for Order Authorizing Use of Cash Collateral and Provision of Adequate Protection (the “**Motion**”) [Dkt. 3] with the United States Bankruptcy Court for the District of Utah (the “**Bankruptcy Court**”).

PLEASE TAKE FURTHER NOTICE THAT, in the Motion, the Debtor has asked the Bankruptcy Court for an order authorizing the Debtor to use cash collateral in the ordinary course of the Debtor’s business to pay ongoing and necessary operating expenses upon the terms and conditions set forth in the Motion.

PLEASE TAKE FURTHER NOTICE THAT the Motion, together with all exhibits attached thereto, is on file with the Clerk of the United States Bankruptcy Court for the District of Utah, United States Courthouse, 350 South Main, Room 301, Salt Lake City, Utah 84101, and may be reviewed at that address during regular business hours. Copies of the Motion also may be obtained by making a written request upon Brent D. Wride, bankruptcy counsel for the Debtor, by: (a) mail to 36 South State Street, Suite 1400, Salt Lake City, Utah 84111; (b) e-mail to bwride@rqn.com; or (c) facsimile to (801) 532-7543.

PLEASE TAKE FURTHER NOTICE THAT an *preliminary* hearing on the Motion (the “**Hearing**”) has been scheduled before the Honorable R. Kimball Mosier, United States Bankruptcy Court Judge, for **Monday, July 16, 2018, at 10:00 a.m.**, or as soon thereafter as the matter may be heard, in Room 369 of the Frank E. Moss United States Courthouse, 350 South Main Street, Salt Lake City, Utah 84101. Failure to attend the Hearing may be deemed a waiver of your objection.

PLEASE TAKE FURTHER NOTICE THAT any interested party desiring to respond or object to the relief requested in the Motion must file their written response or objection with the above-captioned Court, and serve a copy of their response or objection upon the undersigned counsel, by no later than **Monday, July 30, 2018**.

PLEASE TAKE FURTHER NOTICE THAT if a timely response or objection to the Motion is not filed, the Court may grant the relief requested in the Motion without conducting the Hearing. Additionally, if a timely response or objection is not filed, the Debtor will ask the Court to approve the Motion without further notice or hearing. Finally, upon resolution of any timely filed and served objections to the Motion, the Debtor also will ask the Court to approve the Motion without further notice or hearing.

YOUR RIGHTS MAY AND LIKELY WILL BE AFFECTED BY THE MOTION, AS MORE PARTICULARLY SET FORTH ABOVE AND IN THE MOTION. YOU SHOULD READ THIS NOTICE AND THE MOTION CAREFULLY, AND DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE IN THE ABOVE-ENTITLED BANKRUPTCY CASE. (IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT WITH ONE.) IF YOU DO NOT OPPOSE OR OTHERWISE OBJECT TO THE MOTION, YOU NEED NOT FILE A WRITTEN RESPONSE, AND YOU NEED NOT ATTEND THE HEARING.

If you do not want the Court to grant the preliminary relief requested in the Motion, or if you want the Court to consider your views concerning the Motion, then you or your attorney must attend the preliminary hearing on the Motion, which has been scheduled for **Monday, July 16, 2018, at 10:00 a.m.** in Room 369 of the United States Courthouse, 350 South Main Street, Salt Lake City, Utah 84101, before the Honorable R. Kimball Mosier, United States Bankruptcy Court Judge.

If you do not want the Court to grant the final relief requested in the Motion, or if you want the Court to consider your views concerning the Motion, then you or your attorney must do the following:

A. On or before **Monday, July 30, 2018**, you must file a written response with the Court explaining your position with respect to the Motion. You should file your written response or objection with the Clerk of the Bankruptcy Court, and serve a copy of your response or objection on counsel for the Debtor; and

B. Attend the preliminary hearing on the Motion, which has been scheduled for **Monday, July 16, 2018, at 10:00 a.m.** in Room 369 of the United States Courthouse, 350 South Main Street, Salt Lake City, Utah 84101, before the Honorable R. Kimball Mosier, United States Bankruptcy Court Judge.

If you mail your written response to the Court for filing, you must mail it early enough so that the Court will actually **receive it** on or before the date stated above. You must also mail to or otherwise serve a copy of your written response upon counsel for the Debtor, Brent D. Wride, Ray Quinney & Nebeker P.C., 36 South State Street, Suite 1400, Salt Lake City, Utah 84101.

Dated this 13th day of July, 2018.

RAY QUINNEY & NEBEKER P.C.

/s/ Brent D. Wride
Brent D. Wride
*Proposed General Bankruptcy and Litigation
Counsel for the Debtor in Possession*

1459199

CERTIFICATE OF SERVICE

I hereby certify that July 13, 2018 a true and correct copy of the foregoing **NOTICE OF DEBTOR'S EMERGENCY MOTION FOR ORDER AUTHORIZING USE OF CASH COLLATERAL AND PROVISION OF ADEQUATE PROTECTION AND NOTICE OF**

PRELIMINARY HEARING ON MOTION was electronically filed and therefore served via ECF on all parties that have entered an electronic appearance in this case.

In addition:

1. On July 12, 2018, I provided telephonic notice of the motion and of the preliminary hearing to Laurie Cayton of the Office of the United States Trustee. On July 13, 2018, a copy of the foregoing notice was sent by electronic mail to Laurie Cayton, Laurie.Cayton@usdoj.gov. A copy was also mailed on July 13, 2018, by first class U.S. mail, postage prepaid to:

Laurie Cayton,
Office of the United States Trustee
405 South Main Street, #300
Salt Lake City, UT 84111

2. On July 12, 2018, I provided telephonic notice of the motion and the preliminary hearing to Steve at GTR Source. On July 13, 2018, a copy of the foregoing notice was sent by electronic mail to steve@gtrsourcecellc.com. A copy was also mailed on July 13, 2018, by first class U.S. mail, postage prepaid to:

GTR Source LLC
111 John Street, Ste. 1210
New York, NY 10038

3. On July 12, 2018, I provided telephonic notice of the motion and the preliminary hearing to John at Richmond Capital Group. John did not provide an e-mail address but requested instead that the papers be sent to Richmond Capital Group at the address on file with the Debtor. Accordingly, on July 13, 2018, a copy of the foregoing notice was mailed by first class U.S. mail, postage prepaid to:

Richmond Capital Group, LLC
111 John Street, Ste. 1210
New York, NY 10038

4. On July 12, 2018, I left a voice-mail message for Richmond Funding notifying it of the motion and the preliminary hearing. On July 13, 2018, I sent a copy of the foregoing notice by Federal Express, *next-day delivery*, to:

Richmond Funding
30 Broad Street, 14th Floor, Suite 14108
New York, NY 10004

5. On July 13, 2018, a copy of the foregoing notice was sent by electronic e-mail to the 20 largest unsecured creditors, as listed in the *List of Creditors Who Have the 20 Largest Unsecured Claims*, which was filed with the Court on July 11, 2018 [Doc. 2], at the following e-mail addresses:

Johnson, Bruce & Piega Delaney	brucej@brucejohnson.com
Stickel, Walt & Esther	walt@waltstickel.com
Liu, Meilin	1liumeilin@gmail.com
Ahangarzadeh, Mansour & Lupita	mahangarzadeh@hotmail.com
Vuong, Van & Cindy	vuon0005@yahoo.com
Pulley, Brent	007bpd@gmail.com
Young, Julie & Walter Grevesmuhl	julie@julieyoungdds.com
Olson, Dennis & Jane	dennisolson@cox.net
Theobald, John & Susan	jtheobald8@cox.net
Williams, Kevin & Matti	matti@kamaj.com
Miller, Richard & Mary Kay	rpmkmiller@charger.net
Moller, Dick & Lisa	adigitaldoc@gmail.com
Malone, Mike & Alma	mike@mikemalonedds.com
Mathews, Michael & Robbie	rsmathews1970@gmail.com
Franklin, Elbert & Kathy	elbertkathy@hotmail.com
Filippi, Woody & Jeanette	bitedr@cox.net
Stang, Michelle	justpinkaboutit@yahoo.com
Skovmand, Brent & Judy	bskovmanddds@gmail.com

Clay, Tim and Barbara	clayorganicseeds@gmail.com
IRA Services Trust Company	info@iraservices

Dated this 13th day of July, 2018.

RAY QUINNEY & NEBEKER P.C.

/s/ Brent D. Wride
Brent D. Wride
*Proposed General Bankruptcy and Litigation
Counsel for the Debtor in Possession*